

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

Aug 16, 2024

s/ D. Olszewski

Deputy Clerk, U.S. District Court
Eastern District of Wisconsin

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

USPS Priority Mail tracking number
9405 5362 0624 8681 7398 13

}

Case No. 24 MJ 184

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

USPS Priority Mail parcel 9405 5362 0624 8681 7398 13 addressed from, "AMI TECH 110 W 11th St., 400A, Los Angeles, CA 90015", addressed to "Ryan Beyer 1401 Heerman Ct., Sheboygan, WI 53081-2544."

located in the Eastern District of Wisconsin, there is now concealed (identify the person or describe the property to be seized):

A controlled substance, fruits of crime, or other evidence of distribution of a controlled substance, and unlawful use of a communication facility, in violation of 21 U.S.C. §§ 841(a)(1), 843(b) and 846.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

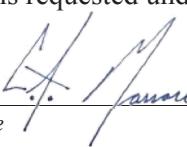
Code Section
21 U.S.C. § 841(a)(1)
21 U.S.C. § 843(b)
21 U.S.C. § 846

Offense Description
Distribution of a controlled substance, unlawful use of a communication facility,
and conspiracy.

The application is based on these facts:

Please see attached affidavit, which is hereby incorporated by reference.

- Continued on the attached sheet.
- Delayed notice of _____ days (give exact ending date if more than 30 days: 02/12/2025) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

Christopher A. Massari, Inspector USPIS

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
Telephone _____ (specify reliable electronic means).

Date: 08/16/2024


Judge's signature

City and state: Milwaukee, Wisconsin

Honorable William E. Duffin, U.S. Magistrate Judge

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Christopher A. Massari, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector (PI), assigned to the United States Postal Inspection Service (“USPIS”) Domicile in Milwaukee, Wisconsin. I have been a federal law enforcement officer for over thirteen years. From May 2011 to January 2022, I served as a Special Agent with the United States Department of State, Diplomatic Security Service and from January 2022 to the present day, with the USPIS.

2. The USPIS is the primary investigative arm of the United States Postal Service (“USPS”) and is charged under Title 18, United States Code, 3061 with the enforcement of laws governing the use and movement of the United States Mail, including the misuse and fraudulent schemes involving the mail, crimes relating to mail fraud, narcotics trafficking, and identity theft involving the United States Mail.

3. I have participated in numerous complex organized crime investigations which involved violations of state and federal controlled substances laws and other related offenses. I have extensive experience with investigating international organized criminal organizations that specialize in identity theft, human smuggling, prostitution, counterfeit products, visa fraud, and monetary structuring to finance larger criminal operations including terrorism and controlled substance distribution. I have had both formal training and have participated in numerous complex organized crime investigations. More specifically, my training and experience includes the following:

- a. I have participated in over 47 search warrants where controlled substances, drug paraphernalia, and organized crime records were seized;

- b. I am familiar with the appearance and street names of various drugs, including marijuana, heroin, cocaine, cocaine base (unless otherwise noted, all references to crack cocaine in this affidavit is cocaine base in the form of crack cocaine), ecstasy, and methamphetamine. I am familiar with the methods used by drug dealers to package and prepare controlled substances for sale;
- c. I know that drug traffickers often use electronic equipment and wireless and land line telephones to conduct drug trafficking operations;
- d. I know that drug traffickers commonly have in their possession, and at their residences and other locations where they exercise dominion and control, firearms, ammunition, and records or receipts pertaining to such;
- e. I know that drug traffickers often put their telephones in nominee names in order to distance themselves from telephones that are utilized to facilitate drug trafficking;
- f. I know that drug traffickers often use drug proceeds to purchase assets such as vehicles, property, and jewelry. I also know that drug traffickers often use nominees to purchase and/or title these assets in order to avoid scrutiny from law enforcement officials; and
- g. I am familiar with how criminal organizations use the USPS and other parcel delivery organizations to circumvent the law enforcement inspection process.

4. Based on my training received at the Federal Law Enforcement Training Center (FLETC), personal experience, on the job training, and working with other Postal Inspectors and North Central, High Intensity Drug Trafficking Area “HIDTA” drug task force officers, I understand the basic fundamentals of narcotics, drugs, paraphernalia, controlled substances, and moneys associated with the sale of narcotics, drugs, and controlled substances are sent through the USPS system, and I am familiar with many of the methods used by individuals who attempt to use the USPS to illegally distribute controlled substances.

PURPOSE OF AFFIDAVIT

5. This affidavit is made in support of a Federal Search and Seizure Warrant for the **SUBJECT PARCEL** (described below), for items which may constitute the fruits, instrumentalities, proceeds and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Distribution and Possession with Intent to Distribute a Controlled Substance), 846 (Conspiracy to Distribution and Possession with Intent to Distribute a Controlled Substance, and

843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance). To seize: any controlled substance, and any paraphernalia associated with the manufacture and distribution of controlled substances including packaging materials and containers to hold controlled substances; proceeds of drug trafficking activities, such as United States currency, money orders, bank checks, precious metals, financial instruments; and drugs or money ledgers, drug distribution or customer lists, drug supplier lists, correspondence, notations, logs, receipts, journals, books, records, and other documents noting the price, quantity, and/or times when controlled substances were obtained, transferred, sold, distributed, and/or concealed.

PARCEL TO BE SEARCHED

6. This affidavit is made in support of an application for a Federal Search and Seizure Warrant for a USPS Priority Mail piece (**SUBJECT PARCEL**). The **SUBJECT PARCEL** is described as a 15" L x 11.625" W x 0.5" H, white USPS Priority Mail, flat rate Tyvek self-sealing envelope, weighing approximately 2 ounces or 57 grams, and bearing USPS Priority Mail postage and USPS tracking number 9405 5362 0624 8681 7398 13. The **SUBJECT PARCEL**'s printed third-party postage meter label is addressed from, "AMI TECH 110 W 11th St., 400A, Los Angeles, CA 90015." The **SUBJECT PARCEL** is addressed to "Ryan Beyer 1401 Heerman Ct., Sheboygan, WI 53081-2544." The **SUBJECT PARCEL** possessed a postage paid label displaying a printed acceptance zip code of Los Angeles, CA 90015. The postage paid was \$8.77.

INVESTIGATION OF THE SUBJECT PARCEL

7. I, and other Postal Inspectors, have identified a trend of drug traffickers mailing controlled substances into the Eastern District of Wisconsin, from states in the Western United States, the Caribbean, and along the international border such as: Washington, Oregon, California, Colorado, Nevada, New Mexico, Texas, Arizona, and the territorial island of Puerto Rico. There, controlled substances are more easily and readily available, due to certain state laws, and a porous international border, among other reasons. Inasmuch as individuals who would receive these controlled substances through the United States Mail are obliged to pay for said controlled substances, often, the United States Mail is utilized by drug recipients to send payments back to the drug traffickers along the West Coast, along the Southwestern United States and Puerto Rico. As such, within the Prohibited Mailing of Narcotics program area of the USPIS, certain indicators have been identified around the trafficking of both illegal drugs, and their proceeds, through the United States Mail.

8. I, along with other Milwaukee Postal Inspectors, conduct routine examinations of Postal Service databases and the outside of parcels traveling in the USPS Priority Mail and Express Mail to and from the Eastern District of Wisconsin from states in the Southwest and Western United States as well as the territory of Puerto Rico.

9. On Monday, August 12, 2024, the **SUBJECT PARCEL** was accepted into the USPS mail system in Los Angeles, CA. On Thursday, August 15, 2024, the **SUBJECT PARCEL** arrived at the USPS Sheboygan Post Office, 522 North 9th Street, Sheboygan, WI 53081. On that same day USPIS Milwaukee intercepted the **SUBJECT PARCEL** for further inspection. The delivery address of 1401 Heerman Ct., Sheboygan, WI 53081-2544 is suspected to be associated

with recent Sheboygan County Multi-Jurisdictional Enforcement Group (MEG) intelligence of controlled substances arriving at the location through various shipping methods.

10. Visual examination of the exterior revealed the **SUBJECT PARCEL** was addressed on an electronically printed third-party commercial postage meter label with a “ship to” addresses printed on it. The parcel was specifically addressed in the following manner:

From: AMI TECH
110 W 11TH ST
400A
LOS ANGELES CA 90015

To: RYAN BEYER
1401 HEERMAN CT
SHEBOYGAN WI 53081-2544

11. No phone numbers or other information was listed on the **SUBJECT PARCEL** due to the Priority Mail parameters of shipping.

CLEAR and K9 alert to the SUBJECT PARCEL

12. I conducted a search of the Thomson-Reuters CLEAR database for information written on the mailing label for the addressed sender; AMI TECH 110 W 11th St., 400A., Los Angeles, CA 90015. The Thomson-Reuters CLEAR database returned no records regarding this business at the listed address. Based on my training, experience, and discussions with fellow Postal Inspectors, it is a common practice in postal based drug trafficking for members to use fictitious names and addresses to evade law enforcement detection as a legitimate parcel. I also conducted a search of the Thomson-Reuters CLEAR database for information printed on the mailing label for the addressed intended recipient, Ryan Beyer 1401 Heerman Ct., Sheboygan, WI 53081-2544. The Thomson-Reuters CLEAR database returned a record for a Ryan Beyer at this location.

13. The United States Postal Inspection Service is a member agency of the North Central, High Intensity Drug Trafficking Area “HIDTA”, a multi-agency antidrug task force,

organized under the Office of the National Drug Control Policy. USPIS Milwaukee also works closely with the Sheboygan County Multi-Jurisdictional Enforcement Group (MEG) that is tasked with investigating narcotics trafficking within Sheboygan County. I contacted Sheboygan Police Officer (PO) Matthew Heimerl, a certified narcotics canine (K-9) handler who is also a member of Sheboygan County MEG, for assistance in conducting a K-9 sniff of the air near the **SUBJECT PARCEL.**

14. On August 15, 2024, I met with PO Heimerl and his K-9 "Grimm." Together, PO Heimerl and Grimm are a certified Police Narcotic Detection Team with over five weeks (1000 hours) of intensive training and they are accredited through DNA Kennels, in Wingate, NC, deploying and utilizing a drug detection canines; that this certification is based on guidelines set forth by the North American Police Work Dog Association (NAPWDA) which is a nationally based group in partnership with local, state, federal and international agencies including private vendors, law enforcement and first responders; that this training establishes consensus-based best practices for the use of detection canine teams by improving the consistency and performance of deployed teams which will improve interdiction efforts as well as courtroom acceptance. Grimm is trained to detect the odor of controlled substances; that these substances include marijuana, cocaine, heroin, methamphetamine, etc., as well as other dangerous drugs due to chemical processing similarities; that upon location of the odor of these controlled substances, the dog's behavior will change; that the dog is trained to come to a final indication or response of a sit at the source of the odor; that this final indication or response is called an "Alert"; furthermore, this final indication or response or "Alert" may also indicate items recently contaminated with, or associated with, the odor of one or more controlled substances. PO Heimerl states that during training and law enforcement operations, Grimm has alerted to the presence of controlled substances that he is

trained to detect, over 450 times since assigned as a Police Narcotic Detection Team and those controlled substances or a drug nexus was located. PO Heimerl and Grimm were most recently certified on June 3, 2024.

15. On August 15, 2024, I placed the **SUBJECT PARCEL** on the ground in the Sheboygan Post Office's second story administrative office hallway with five other similarly sized empty parcels. PO Heimerl indicated Grimm located and alerted to the parcel known to be the **SUBJECT PARCEL**. PO Heimerl informed me Grimm's alert indicated the presence of controlled substances or other items with a drug nexus, such as proceeds of controlled substances, which have been recently contaminated with, or associated with the odor of one or more controlled substances.

16. Based upon the information as outlined in this affidavit, I strongly believe that the **SUBJECT PARCEL** may contain controlled substances being trafficked through the United States Mail. Consequently, I respectfully request authorization to open the **SUBJECT PARCEL** and search its contents for evidence of controlled substance trafficking. I also request permission to seize contents of the **SUBJECT PARCEL** as evidence, that may constitute contraband, proceeds or fruits of the crime of violations of Title 21, United States Code, Sections 841(a)(1) (Distribution and Possession with Intent to Distribute a Controlled Substance), 846 (Conspiracy to Distribution and Possession with Intent to Distribute a Controlled Substance, and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance).

17. I have not included in this affidavit each and every fact known to me regarding this investigation and search warrant application request; the facts included are only those that I, respectfully, believe may relate to a determination of whether there is probable cause to believe

that items sought to be seized will be found in the place, or item, to be searched, and whether those items are evidence of the offenses identified in this affidavit.

18. The **SUBJECT PARCEL** is currently being held at the United States Postal Inspection Service office in Milwaukee, Wisconsin.

19. Further, it is respectfully requested that this Court issue an order pursuant to Title 18 U.S.C. § 3103a(b), finding that immediate notification may have an adverse result listed in Title 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized for a period up to 180 days, unless an extension is requested. I believe that immediate notification of the contents of this affidavit and related documents may have a significant and negative impact the investigation into Postal based drug trafficking and may severely jeopardize its effectiveness.